

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

**CERTIFICATION OF BRAD B. ERENS IN SUPPORT OF
APPLICATION FOR ADMISSION OF ATTORNEY *PRO HAC VICE***

I, Brad B. Erens, of full age, hereby certify as follows:

1. I am a partner with the law firm of Jones Day, 110 North Wacker, Suite 4800, Chicago, Illinois 60606.

2. I make this certification in connection with my application to be admitted *pro hac vice* in the above captioned bankruptcy case to represent Debtor, LTL Management LLC as proposed co-counsel.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

3. I am a member in good standing of the bars of the following courts, to which I was admitted in the years indicated: State of Illinois (1991) and United States District Court for the Northern District of Illinois (1991).

4. I am not under suspension or disbarment by any court.

5. I have no disciplinary proceeding pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

6. I have been advised of my obligation to make payments of an annual fee to the New Jersey Lawyers Fund For Client Protection in accordance with New Jersey Court Rule 1:28-2, and have already satisfied that payment for 2023 in connection with my admission *pro hac vice* before this Court in the related bankruptcy case captioned *In re LTL Management LLC*, Case No. 21-30589 (MBK).

7. I have familiarized myself with the Local Rules of Bankruptcy Procedure promulgated by this Court and will at all times conduct myself in accordance with such Rules during the conduct of this case.

8. I understand that if I am admitted *pro hac vice* to this Court, I am within its disciplinary jurisdiction and I voluntarily consent to the same and certify that I will abide with all rules, regulations and orders of this Court.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 4, 2023

/s/ *Brad B. Erens*

Brad B. Erens